

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

=====

**DEIRDRE YOUNG,**

**Plaintiff**

**v.**

**Civil Case No. 1:23cv00445-PTG-JFA**

**WASHINGTON GAS LIGHT  
COMPANY & TEMPORARY  
SOLUTIONS**

**Defendants**

=====

**Plaintiff Young's Response to Defendants Objections to  
Plaintiff's Witness and Exhibit List.**

The Plaintiff Deirdre Young files her Response to the oppositions filed by the Defendants and Temporary Solutions (ECF 48) and Washington Gas Light Company (ECF 49) to Young's Witness and Exhibit List (ECF 46).

In Young's Witness and Exhibit List, Young identified 50 exhibits and 11 witnesses (plus all witnesses identified by the Defendants). Both Defendants did not object to any of Plaintiff's witnesses.

Both Defendant's did object to Young's documents/exhibits identified, specifically that not all of the page designations for exhibits : 2, 3, 6, 10, 17, 20, 26, 33, 34 and 39 were identified. To that end, we agree with the page designations identified by Temporary Solutions for the aforementioned exhibits and incorporate the page designations identified by Temporary Solutions. Washington Gas Light had also raised similar objections to the aforementioned exhibits identified by Temporary Solutions, and once again, agree to the page designations

identified by Temporary Solutions. Washington Gas had also objected to the description of some of the documents as “argumentative,” we will therefore describe them in neutral language, where possible.

We will deal with any other objections on the grounds of relevance at the time of trial and/or at the time of any motions in Limine.

Below is the revised exhibit list, taking into account the objections made by the Defendants.

<b>Exhibit No</b>	<b>Bates No</b>	<b>Description of Document</b>	<b>Date</b>	
<b>1</b>	TS_000001 <sup>1</sup>	Dunn email to Temporary Solutions (TS)	5/6/2020	
<b>2</b>	TS_003-007	Email to HR	6/15/2020	
<b>3</b>	TS_008-009	TS interview notice for Young	6/19/2020	
<b>4</b>	TS_10-11	WA Gas and TS Placement Agreement		
<b>5</b>	TS_23	Email from Young to TS	6/12/2020	
<b>6</b>	TS_24-27	Dunn states that Young is performing	4/2/2019	
<b>7</b>	TS_28	Employees who replaced Young		
<b>8</b>	TS_32-34	Tyrita Thomas’ email and letter to HR about Robb’s complaints.	6/11/2020	
<b>9</b>	TS_35-38	Young letter to HR about Robb	6/11/2020	
<b>10</b>	TS_43-54	TS interview notice to Young.	6/18/2020	
<b>11</b>	TS_55-60	TS EEO interviews with coworkers.	June – Aug 2020	
<b>12</b>	TS_61	Young note to Robb about positive energy	unknown	
<b>13</b>	TS_70-71	Dunn email to TS that they are bringing people on	5/21/2020	

<sup>1</sup> In this filing, we will identify the documents from Temporary Solutions by their last 2-3 digits.

		board June 2020.		
<b>14</b>	TS_73-88	WGL & TS Temp Contract		
<b>15</b>	TS_94-102	TS response to US EEOC	9/4/2020	
<b>16</b>	TS_107-128	TS EEO Handbook		
<b>17</b>	TS_129-132	Young W2s	2017-2020	
<b>18</b>	TS_132-136	Young TS/WG Payroll Hours	2018-2020	
<b>19</b>	TS_199	Young email to Drain	3/16/2020	
<b>20</b>	TS_140-141	Dunn email to TS that operations are suspended	3/18/2020	
<b>21</b>	TS_202-204	Hourly Sheets	Jan – March 2020	
<b>22</b>	WGL_000001-2 <sup>2</sup>	Robb Statement to US EEOC.	9/4/2020	
<b>23</b>	WGL_3-6	Offer letter to Thoams Robb & Resume	10/8/2019	
<b>24</b>	WGL_9-22	Robb 2020 evaluation.	2020	
<b>25</b>	WGL_23-34	Robb 2021 Evaluation	2021	
<b>26</b>	WGL_35-36	Robb Resignation letter	3/15/2022	
<b>27</b>	WGL_39-54	WG-TS Contract	unknown	
<b>28</b>	WGL_61-62	Dunn EEOC Affidavit.	9/4/2020	
<b>29</b>	WGL_57-60	EEO Policy	April 2020	
<b>30</b>	WGL_63-136	WG 2022 Financial Report		
<b>31</b>	WGL_137-140	Young HWE Report to WGL	6/11/2020	
<b>32</b>	WGL_141-143	Proctoring Job Description	unknown	
<b>33</b>	WGL_148-149	Dunn email to TS about shutting down operations at WG	3/18/2020	
<b>34</b>	WGL_150-151	Dunn Email to TS	5/22/2020	
<b>35</b>	WGL_152-154	EEO Policy	March 2020	
<b>36</b>	WGL_155	Org Chart	unknown	
<b>37</b>	WGL_166	Document on Robb Termination	unknown	
<b>38</b>	WGL_167-192	Position Statement to US	9/9/2020	

<sup>2</sup> In this filing, we will refer to the documents submitted by Washington Gas Light (WGL) by their last 2-3 digits.

		EEOC		
<b>39</b>	WGL_193-194	Robb and Dunn interview candidates	5/21/2020	
<b>40</b>	WGL_222	Robb email to Young	3/5/2020	
<b>41</b>	WGL_226-231	WGL Internal HWE Summary	2020	
<b>42</b>	WGL_234-235	"No reason" given for Deirdre not returning to work	unknown	
<b>43</b>	WGL_242-243	WGL Disciplinary Warning to Robb	10/30/2020	
<b>44</b>	Young-004	Email with Young about pay increase	6/28/2018	
<b>45</b>	Young-10 to 13	Robb email to staff about time cards and schedule	1/3/2020	
<b>46</b>	Young-14 to 15	Young emails with Robb about change of duties and instructions	3/6/2020	
<b>47</b>	Young-017 to 019	Young email to Holly Anzano regarding pay raise	March – April 2019	
<b>48</b>	Young-020 to 34	Young note on job enquiries.	2019-2022	
<b>49</b>	Young-034 to 37	Young applications for unemployment with Virginia	2020-2021	
<b>50</b>	Young-038	DC unemployment application	2023	

Dated: March 12, 2024

*Respectfully Submitted,*

/s/Monique A. Miles

Monique A. Miles  
Virginia State Bar No. 78828  
Old Towne Associates, P.C.

1500 Woodbine Street  
Alexandria, VA 22302  
Telephone: 703.519.6810  
mmiles@oldtowneassociates.com

/s/A.J Dhali  
*Admitted Pro Hac Vice*  
Dhali P.C.  
1629 K Street, NW  
Suite 300  
Washington, DC 20006  
Telephone: 202.556.1285  
ajdhali@dhalilaw.com

*Counsel for Plaintiff Deirdre Young*

**CERTIFICATE OF SERVICE**

A copy of the foregoing was filed on 3/12/2024 with electronic copies sent to the following counsel for the Defendants:

Grant E. Mulkey  
Virginia State Bar No. 82452  
1201 Walnut Street  
Suite 2900  
Kansas City, MO 64106  
Telephone: 816.691.3203  
Fax: 816.412.8124  
grant.mulkey@stinson.com

Bernadette C. Sargeant  
*Admitted Pro Hac Vice*  
1775 Pennsylvania Avenue, NW  
Suite 800  
Washington, D.C. 20006  
202.728.3018  
bernadette.sargeant@stinson.com

*Counsel for Defendant Washington Gas  
Light Company*

Justin F. Ferraro  
Virginia State Bar No. 92226  
2100 Pennsylvania Avenue, NW  
Suite 350S  
Washington, DC 20037  
Telephone: 202.677.4967  
Fax: 202.677.4031  
justin.ferraro@agg.com

Henry Perlowski  
*Admitted Pro Hac Vice*  
171 17th Street NW, Suite 2100  
Atlanta, GA 30363  
Telephone: 404.873.8684  
henry.perlowski@agg.com

Lindsey Locke  
*Admitted Pro Hac Vice*

171 17th Street NW, Suite 2100  
Atlanta, GA 30363  
Telephone: 404.873.8712  
lindsey.locke@agg.com

*Counsel for Defendant Temporary Solutions, Inc.*

/s/ Monique Miles